IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
Plaintiff,)	C. A. No. 05-292 (JJF)
v.)	DEMAND FOR JURY TRIAL
TATUNG COMPANY; TATUNG COMPANY OF AMERICA, INC.;)	
CHUNGHWA PICTURE TUBES, LTD.;)	
AND VIEWSONIC CORPORATION,)	
Defendants.)	

MOTION FOR CONTINUANCE OF PRE-TRIAL CONFERENCE DATE

Defendants Tatung Company, Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd. and Viewsonic Corporation ("Defendants"), by and through undersigned counsel, hereby move this Court for a continuance of the pre-trial conference date in the above captioned matter presently set for June 16, 2006. For the reasons set forth below, Defendants request that this Court issue an Order continuing the pre-trial conference date for approximately 20 days to allow the parties to complete fact and expert discovery. In support of this motion, Defendants state as follows:

- 1. On December 23, 2005 the Court entered a scheduling order in this case (the "Scheduling Order") setting forth a pre-trial conference date of June 16, 2006.
- 2. In the same scheduling order the Court also set deadlines for the close of fact discovery (February 2, 2006), disclosure of Plaintiff's expert reports (March 31, 2006), disclosure of Defendants' expert reports (April 14, 2006) and close of expert discovery (April 28), 2006.

- 3. Due to the complex nature of the litigation most, if not all, of the dates set forth in the Scheduling Order have been extended. Fact discovery did not close until early April, fact depositions remain in progress and expert discovery has not yet begun. Final expert reports will be submitted on June 16, 2006 (the date of the pre-trial conference) and expert depositions will continue for an additional two weeks.
- 4. The parties are currently working diligently to finish the remaining depositions and exchange expert reports. Proceeding on the current schedule would cause a waste of resources because extensive supplemental pre-trial submissions will likely be necessary at the conclusion of expert discovery. Re-scheduling the pre-trial conference will allow the parties to focus on the completion of fact and expert discovery and provide the Court with a complete pre-trial order. The trial date of July 17, 2006 will not be affected by this Motion.

WHEREFORE, the Defendants respectfully request that the Court enter an order rescheduling the pre-trial conference for a time approximately twenty days from the date at which it is currently scheduled.

OF COUNSEL:

Christine A. Dudzik Thomas W. Jenkins Howrey LLP 321 North Clark Street, Suite 3400 Chicago, Illinois 60610 (312) 595-1239

Teresa M. Corbin Glenn W. Rhodes Howrey LLP 525 Market Street, Suite 3600 San Francisco, CA 94105 415.848.4900

Dated: June 1, 2006

Robert W. Whetzel (#2288)

whetzel@rlf.com

Matthew W. King (#4566)

king@rlf.com

Richards, Layton & Finger

One Rodney Square, P.O. Box 551

Wilmington, DE 19899

(302) 651-7700

Attorneys for Defendants/Counterclaimants

Chunghwa Picture Tubes, Ltd.; Tatung

Company; Tatung Company of America,

Inc.; and Viewsonic Corporation.

Rule 7.1.1 Certification

Counsel for Tatung Company, Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd. and Viewsonic Corporation has consulted with counsel for plaintiff pursuant to Delaware Local Rule 7.1.1 and understands that plaintiff will not consent to the relief sought by this motion.

Matthew W. King (#4566) king@rlf.com

Dated: June 1, 2006

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 1, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

> Richard D. Kirk The Bayard Firm 222 Delaware Avenue, Suite 900 P.O. Box 25130 Wilmington, DE 19899

I hereby certify that on June 1, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

> Gaspare J. Bono Matthew T. Bailey Andrew J. Park Adrian Mollo McKenna Long & Aldridge LLP 1900 K Street, NW Washington, DC 20006

> > Matthew W. King (#4566)

king@rlf.com

Richards, Layton & Finger

One Rodney Square

P.O. Box 551

Wilmington, DE 19899